

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

Case No. 17-BK-3283 (LTS)

**RE: ECF Nos. 19520, 19522,
19528, 19529, 19620, 20478,
20540, 20541, 20579, 20582**
(Jointly Administered)

SECOND URGENT OMNIBUS CONSENTED MOTION
FOR EXTENSION OF DEADLINES

Come now NTT DATA EAS, INC. (“NTT Data Eas”) and NTT DATA State Health Consulting, LLC (*fka* Cognasante Consulting, LLC) (“NTT Data State”) (jointly, the “Movants”), by and through the undersigned counsel, hereby file this urgent consented motion for entry of an order, substantially in the form attached hereto as Exhibit 1 (the “Proposed Order”), extending the deadlines set forth in the *Order Granting Urgent Omnibus Consented Motion for Extension of Deadlines* (ECF No. 20582).

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

1. On December 15, 2021, the Movants filed two separate verified motions for allowance of administrative expense claims in connection to certain post-petition services performed to the Commonwealth (the “Motions”) (ECF Nos. 19520 & 19522).

2. On even date, this Court entered two scheduling orders, which required the Commonwealth to respond separately to the Movants’ Motions by December 29, 2021 (ECF Nos. 19528 & 19529).

3. The two scheduling orders were extended on five different occasions, per the Commonwealth’s request and with the Movants’ consent.

4. On April 11, 2022, the Commonwealth filed two objections to the Movants’ Motions (the “Objections”) (ECF No. 20540 & 20541).

5. On April 20, 2022, the Movants requested an extension of time to fully analyze the arguments raised by the Commonwealth in its separate Objections. (ECF No. 20579).

6. The Court, in turn, granted Movants until June 6, 2022 to separately reply to Objections. (ECF No. 20582).

7. The Movants have been gathering the necessary information to adequately reply to the Commonwealth’s Objections. However, the Movants need additional time to complete their analysis and secure certain declarations in support of their replies. Because of this, counsel for the Movants reached out to counsel for the Commonwealth, who consented to a 14-day extension.

8. Accordingly, the Movants, with the Commonwealth’s consent, request a 14-day extension, until June 20, 2022, to file their respective replies to the Commonwealth’s Objections to their verified Motions.

9. Pursuant to Paragraph I.H of the *Sixteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 20190-1], the Movants hereby certify that they have

carefully examined the matter and concluded that there is a true need for an urgent motion; they have not created the urgency through any lack of due diligence; have made a bona fide effort to resolve the matter without a hearing; have made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court; and no party opposes the relief requested herein.

WHEREFORE NTT Data Eas and NTT Data State request the Court enter the Proposed Order and any other relief as is just and proper.

Respectfully submitted.

In Guaynabo, Puerto Rico, on June 3, 2022.

ARROYO & RIOS LAW OFFICES, P.S.C.
PMB 688
1353 Ave. Luis Vigoreaux
Guaynabo, P.R. 00966
Tel.: (787) 522-8080
Fax: (787) 523-5696
E-mail: mrrios@arroyorioslaw.com

s/ Moraima S. Ríos Robles
Moraima S. Ríos Robles
USDC-PR No. 224912

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice electronically to all counsel of record, and will provide hard copies to the Court and United States Trustee as soon as practical after the filing of the foregoing, consistent with the Court's Fifteenth Amended Case Management Order. *See* Docket No. 20190-1.

Dated: June 3, 2022.

s/ Moraima S. Ríos Robles
Moraima S. Ríos Robles
USDC-PR No. 224912